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September 25, 1991

Mr. Wayde M. Hartwick, RPM  
Mail Code 5HS-11  
U.S. EPA, Region V  
230 South Dearborn  
Chicago, Illinois 60604

RE: Summary of Modifications  
Baseline Risk Assessment  
American Chemical Services NPL Site  
Project # 60251

Dear Mr. Hartwick:

Warzyn received two letters from you with U.S. EPA review comments on Section 7 of the ACS RI Report. We received the first letter with 9 comments on August 19, 1991 and the second letter with 12 additional comments on August 28, 1991.

We submitted re-draft of the Baseline Risk Assessment to you on September 20, 1991, and you have asked us to provide a summary of the pages and sections where each of the changes was made to the document. The following summarizes the locations at which we modified the document.

EPA Comment

<u>Number</u>	<u>Modification to Section 7, RI Report</u>
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Comments in letter received on August 19, 1991.

- |   |  |
|---|--|
| 1 | The comment is addressed beginning on Page 47 of the text. Section 7.1.5.4.1.4 was added to address the comment.   |
| 2 | Page 56 of the revised text indicates the paragraph previously in question has been removed. The second paragraph on Page 56 of the re-drafted BRA replaced the previous paragraph.  |
| 3 | The source "HEAST, FY 91" was added to the footnote section of Table 7-18.   |
| 4 | All references to risks calculated for lead have been removed, affecting sections throughout the text. Most notable is the conclusions section, Section 7.1.5.2, on Page 40, was added on the basis of a telephone conversation with Pat VanLeeuwen. The attached hand-written pages indicate which tables and appendices were modified. |



**EPA Comment  
Number**

**Modification to Section 7, RI Report**

- 5 We discussed this comment further with Ms. VanLeeuwen after receiving the comments. The issues are addressed in several tables and appendices. Pages 1 and 2 of the attached hand-written table indicates the affected tables and appendices.
- 6 The reference to Appendix Y has been changed to Appendix Z.
- 7 The IR was changed to 100 ug/L. Page 3 of the attached hand-written table shows which tables and appendices were affected. Since no changes in calculated risks resulted, no text was changed.
- 8 Table T-17 was modified to integrate body weight and time. Pages 1 and 3 of the attached hand-written table indicates the tables and appendices changed. Conclusions regarding risks were not affected so no text was changed.
- 9 The hand-calculation-model provided by EPA was implemented for the Griffith Landfill. The model calculations and results are contained in Appendix Y. Section 7.1.3.7.1.1 (page 31) was added to the text.

**Comments in letter received on August 19, 1991.**

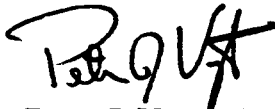
- 1 Change made as requested on page 1.
- 2 Change made as requested on page 1.
- 3 Change made as requested on page 6.
- 4 Abbreviating "ft" without a period after it is a standard Warzyn format.
- 5 Changes made as requested on page 12 and in Table 7-15.
- 6 The sentence was left because the data obtained during the remedial investigation support this statement. Furthermore, two models were conducted to evaluate potential future releases.

- 7 Paragraph was deleted from test as requested (see pages 24 and 25).
- 8 Sentence deleted as requested on page 41.
- 9 Change made as requested on page 44.
- 10 Lead exposure discussion was expanded where relevant (e.g., pages 45 and 46, and pages 40 and 41).
- 11 Deleted entire paragraph (see page 56).
- 12 Change made as requested on page 57.

This is a summary of the changes which were made to the Baseline Risk Assessment. Please call me if you have any questions regarding the revised document.

Sincerely yours,

WARZYN INC.



Peter J. Vagt, Ph.D.  
Project Coordinator

cc: PRP Technical Subcommittee

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# TABLE 1

ALS RISK ASSESSMENT

60251.23

SEPTEMBER 1991

REVISED TABLES

JTHP  
9-4-91

TABLE	Pathway / Title	Revision
7-17	Toxicity Table	Lead RFD removed
7-22	GW-UPPER, offSite Child, Current	lead HQ removed
7-23	KP-Surface, child Trespasser, Current	IR=100, Pb HQ removed
7-24	SW, child Trespasser, Current; Child Res, Future	Pb HQ removed
7-31	GW-Upper, Onsite Res, Future	"
7-33	Onsite-Soil, Res, Future	IR=120, BW=59
7-34	SB-TL Soil, Res, Future	" " , Pb HQ
7-35	offSite-Soil, Res, Future	" "
7-36	KP Surf Soil, Res, Future	" " , Pb HQ
7-37	KP Sub Soil, Res, Future	" " , "
x-7	GW-Upper, offSite Child, current	Pb HQ = ND
x-9	KP Surf, child Trespasser, Current	IR=100, Pb HQ = ND
x-10	KP-Surf " "	"
x-11	SW, child Trespasser, Current	Pb HQ = ND
x-25	GW-Upper, Onsite Res, Future	"
x-29	Onsite-Soil, Res, Future	IR=120, BW=59
x-30	" " "	" "
x-31	SB-TL Soil, Res, Future	" " , Pb HQ = ND
x-32	" " "	" "
x-33	offSite-Soil, Res, Future	" "
x-34	" " "	" "
x-35	KD-Surf Soil, Res, Future	" " , Pb HQ = ND
x-36	KP " " "	" "
x-37	(Sub) KP-Soil, Res, Future	" " , Pb HQ = ND
x-38	" " "	" "
x-39	SW. Res Child, Future	Pb HQ = ND

\* ND (D-C) 7E-X  
 ✓ (H-H) 5E-X  
 \* ND (O-C) 7E-X  
 ✓ (O-H) 1E-X  
 ND (M-C) 7E-X  
 ✓ (M-H) 5E-X  
 ND (K-C) 7E-X  
 ND (K-H) 7E-X  
 ND (G-C) 8E-X  
 ND (G-H) 7E-X  
 ND (H-C) 7E-X  
 / (H-H) 7E-X  
 ND (E-C) 7E-X  
 ✓ (E-H) 7E-X  
 ND (A-C) 7E-X  
 / (A-H) 7E-X  
 ND (D-C) 7E-X  
 ND (D-H) 7E-X

7-37 (R-T) ✓ \*  
 7-36 (Q-T) ✓ \*  
 7-34 (O-T) ✓ \*  
 7-31 (M-T) ✓  
 7-24 (H-T) ✓  
 7-23 (E-T) ✓  
 7-22 (A-T) ✓

Appendix II tables

Chapter 7 tables with lead (to be revised)

LEAD

TABLE 1

2

X-40 (H-C) ND  
 X-39 (H-H) ✓  
 X-38 (R-C) ND \*  
 X-37 (R-H) ✓

\* table revised for a different comment

Lead had RFD, but no SF. therefore, Cancer (X-5) tables had no revisions (ND)

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# TABLE 1

Comment 7.

Trespasser Child IR

(change from 200 back to 100)

Table	7-6
	7-23
	X-9
	X-10

(K.P. Surface)

[ACS. 2020. Brn.] E-T, W20

E-H,

E-C,

19,119

Intake

NC

C

H

C

O-R

S-U

W-AA

AC-16

EI

E

Lead

Comment 4.

Table 7-17

7-19 thru 7-35

X-1 thru X-42

Tox values, Mar 200

[ACS. 2020. Brn.] Ton-Table, W20

See Attached list for Tables

Comment 8

(30 yr exposure for soil)

Change ingestion { IR to 120 }  
BW to 59 }

spreadsheet

Table	7-33
	7-34
	7-35
	7-36
	7-37

On Site

21-117

N, N1, N-C, N-H, N-T

SB-TL

21-150

O

Off Site

21-156

P

K.P. Surf

Q

KP

21-220

R

(N through R)